



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

OPERATING PERMIT

Arkwright, Inc.

PERMIT NO. RI-31-03(R1)

(Expiration date: 10-10-08)

Pursuant to the provisions of Air Pollution Control Regulation No. 29, this operating permit is issued to:

Arkwright, Inc.
538 Main Street
Fiskeville, RI 02823

This permit shall be effective from the date of its issuance. All terms and conditions of the permit are enforceable by the USEPA and citizens under the federal Clean Air Act, 42 U.S.C. 7401, et seq., unless specifically designated as not federally enforceable.

**Stephen Majkut, Chief
Office of Air Resources**

Date of revision: 10/25/04

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
I. SOURCE SPECIFIC CONDITIONS	1
Requirements for Emission Units B001 (A) and B001 (B)	1
Requirements for Emission Units B002 (A) and B002 (B)	2
Requirements for Emission Unit P001	4
Requirements for Emission Units P002 (A) and P002 (B)	6
Requirements for Emission Units P003 and P007	8
Requirements for Emission Units P005, L001 and L003	14
Requirements for Emission Unit P006	19
Requirements for Emission Unit P012	21
Requirements for Emission Unit P013	26
Facility Requirements	28
Alternative Operating Scenario I	29
Alternative Operating Scenario II	30
Alternative Operating Scenario III	31
Alternative Operating Scenario IV	32
II. GENERAL CONDITIONS	34
Annual Emissions Fee Payment	34
Permit Renewal and Expiration	34
Transfer of Ownership or Operation	34
Property Rights	34
Submissions	34
Inspection and Entry	35
Compliance	35
Excess Emissions Due to an Emergency	36
Duty to Provide Information	37
Duty to Supplement	37
Reopening for Cause	37
Severability Clause	38
Off-Permit Changes	38
Section 502(b)(10) Changes	39
Emissions Trading	40
Emission of Air Contaminants Detrimental to Person or Property	40
Odors	40
Visible Emissions	40
Open Fires	40
Construction Permits	40
Sulfur in Fuel	41
Air Pollution Episodes	42
Fugitive Dust	42
Compliance Certifications	42
Permit Shield	43
Recordkeeping	44
Reporting	44
Credible Evidence	45

Emission Statements.....	45
Miscellaneous Conditions	47
III. SPECIAL CONDITIONS	48
Ozone-depleting Substances	48
Prevention of Accidental Release	49

SECTION I. SOURCE SPECIFIC CONDITIONS

A. Requirements for Emission Units B001 (A) and B001 (B)

The following requirements are applicable to:

- Emission units B001 (A) and B001 (B), each of which is a 4.2 MMBTU/hr Cleaver Brooks boilers, Model No. CB 700-100, capable of burning natural gas and propane.

1. Emission Limitations

a. Particulates

The permittee shall not cause or permit the emissions of particulate matter in excess of 0.1 pounds per million BTU actual heat input. [13.2.1]

b. Opacity

The permittee shall not emit into the atmosphere, any air contaminant, for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]

2. Testing Requirements

a. Particulates

Compliance with the particulate emissions limitations contained in Condition I.A.1.a of this permit, shall be determined by emission testing conducted by the permittee according to Method 5 of 40 CFR 60, Appendix A, or another method approved by the Office of Air Resources and the USEPA, shall be used. [13.3.1]

The requirements of particulate emissions testing may be waived if the Director and the USEPA:

- (1) Specifies or approves, in a specific case, the use of a reference method with minor changes in methodology; or
- (2) Approves the use of an equivalent or alternative method the results of which he has determined to be adequate for indicating whether the permittee is in compliance; or

- (3) Finds that the permittee has demonstrated by other means to the Director's and the USEPA's satisfaction that the source is in compliance with the relevant emissions standards. [13.3.3]

In the absence of data from particulate emissions testing, the Office of Air Resources and the USEPA may determine that an emissions unit is or is not in compliance with the emissions limitations of Condition I.A.1.a of this permit based on available information including, but not limited to, type of fuel burned, design of unit, efficiency of air pollution control systems, operating and maintenance procedures, and emission test results on similar units. [13.3.2]

b. Opacity

Tests for determining compliance with the opacity limitations specified in Condition I.A.1.b of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

B. Requirements for Emission Units B002 (A) and B002 (B)

The following requirements are applicable to:

- Emission units B002 (A) and B002 (B), each of which is a 2.0 MMBTU/hr Cleaver Brooks boilers, Model No. CB-200-50, which is capable of burning #2 fuel oil and natural gas.

1. Emission Limitations

a. Particulates

The permittee shall not cause or permit the emissions of particulate matter in excess of 0.1 pounds per million BTU actual heat input. [13.2.1]

b. Opacity

The permittee shall not emit into the atmosphere, any air contaminant, for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]

c. Sulfur oxides

Unless the Director declares in writing after a hearing that a shortage of low sulfur fuel oil exists, the permittee shall not use or store fuel oil with a sulfur content greater than 1.0% by weight. [8.2]

2. Testing Requirements

a. Particulates

Compliance with the particulate emissions limitations contained in Condition I.B.1.a of this permit, shall be determined by emission testing conducted by the permittee according to Method 5 of 40 CFR 60, Appendix A, or another method approved by the Office of Air Resources and the USEPA, shall be used. [13.3.1]

The requirements of particulate emissions testing may be waived if the Director and the USEPA:

- (1) Specifies or approves, in a specific case, the use of a reference method with minor changes in methodology; or
- (2) Approves the use of an equivalent or alternative method the results of which he has determined to be adequate for indicating whether the permittee is in compliance; or
- (3) Finds that the permittee has demonstrated by other means to the Director's and the USEPA's satisfaction that the source is in compliance with the relevant emissions standards. [13.3.3]

In the absence of data from particulate emissions testing, the Director and the USEPA may determine that an emissions unit is or is not in compliance with the emissions limitations of Condition I.B.2.a of this permit based on available information including, but not limited to, type of fuel burned, design of unit, efficiency of air pollution control systems, operating and maintenance procedures, and emission test results on similar units. [13.3.2]

b. Opacity

Tests for determining compliance with the opacity limitations specified in Condition I.B.1.b of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1,1.3.2]

c. Sulfur Oxides

Compliance with the sulfur limitations contained in Condition I.B.1.c of this permit shall be determined by the procedures referenced in Condition II.U.2 of this permit.

C. Requirements for Emission Unit P001

The following requirements are applicable to:

- Emission unit P001, which is a Dixon Research and Development (R&D) coating machine, used for coating polyester film and paper. P001 is used for both R&D operations and production purposes. P001 is equipped with one drying oven, with a heat input of 2.4 MMBTU/hr, and burns natural gas. The following requirements are applicable when P001 is used for production purposes.

1. Emission Limitations

- a. When P001 is used for production purposes, the VOC content of each coating used by the permittee on P001, shall not exceed 2.9 lbs. VOC/gallon of coating, minus water as applied. [19.3.1, 19.3.2(b), Consent Agreement No. 98-03-AP-CA(6)]

2. Testing Requirements

- a. Compliance with the emission limitation contained in Condition I.C.1.a of this permit shall be demonstrated in accordance with 40 CFR 60, Appendix A, Methods 24, 24A as amended or any other USEPA approved method which has been accepted by the Director. A one-hour bake time shall be used for Methods 24 and 24A, which apply to multi-component coatings. [19.7.1]

3. Recordkeeping Requirements

- a. The permittee when utilizing emission unit P001 for production purposes shall comply with the following record keeping: [Consent Agreement No. 98-03-AP(11)]
 - (1) The name, identification number of each coating, as applied, on P001; [Consent Agreement No. 98-03-AP(11)(A), 19.5.3(c)(1)]
 - (2) The mass of VOC per volume of each coating (excluding water), as applied, used each month on P001; [Consent Agreement No. 98-03-AP(11)(B), 19.5.3(c)(2)]
 - (3) The type and amount of solvent used for diluents and cleanup operations. [Consent Agreement No. 98-03-AP(11)(C), 19.5.3(c)(3)]

4. Reporting Requirements

- a. The permittee when utilizing emission unit P001 for production purposes shall notify the Office of Air Resources of any record showing use of any non-complying coatings by sending a copy of such record to the Office of Air Resources within 30 calendar days following that use. [19.5.3(d)(1)]
- b. The permittee when utilizing P001 for production purposes, and before changing from complying coatings to daily-weighted averaging or control devices, shall submit a Compliance Certification Plan to the Office of Air Resources for review and approval. Such plan shall include:
 - (1) The name and location of the facility; [19.5.2(a)(1), 19.5.4(a)(1)]
 - (2) The name, address and telephone number of the person responsible for the facility; [19.5.2(a)(2), 19.5.4(a)(2)]
 - (3) The name and identification number of the emission units which will comply by means of daily-weighted averaging or control devices; [19.5.2(a)(4), 19.5.4(a)(3)]
 - (4) For daily-weighted averaging:
 - (a) The instrument or method by which the permittee will accurately measure or calculate the volume of each coating (excluding water), as applied, used each day on each emission unit; [19.5.2(a)(5)]
 - (b) The method by which the permittee will create and maintain records each day as required by Subsection 19.5.2(c) of APC Regulation No. 19; [19.5.2(a)(6)]
 - (c) The time at which the facility's day begins if a time other than midnight local time is used to define a day. [19.5.2(a)(7)]
 - (5) For control devices:
 - (a) The name and identification number of each coating, as applied, on each coating line or operation; [19.5.4(a)(4)]
 - (b) The mass of VOC per volume coating solids applied and the gallons of solids of each coating applied; [19.5.4(a)(5)]
 - (c) Identification of each control device which will be or has been installed and date of installation; [19.5.4(a)(6)]

- (d) Identification of coating lines which will be controlled by each control device and documentation of expected capture and destruction efficiency or reduction efficiency; [19.5.4(a)(7)]
- (e) Control device design information;
 - (i) For thermal incinerators – design combustion temperature (°F); [19.5.4(a)(8)(i)]
 - (ii) For catalytic incinerators – design exhaust gas temperature (°F), design temperature rise across catalyst bed (°F), anticipated frequency of catalyst change, and catalyst changes; [19.5.4(a)(8)(ii)]
 - (iii) For condensers – design inlet temperature of cooling medium (°F), design exhaust gas temperature (°F); [19.5.4(a)(8)(iii)]
 - (iv) For carbon adsorbers – design pressure drop across the adsorber, VOC concentration at breakthrough. [19.5.4(a)(8)(iv)]
- (6) Information describing the effect of the change on the emissions of any contaminant. [9.2.1]
- (7) A demonstration that emissions from the stationary source will not cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by APC Regulation No. 22. [22.3.3(a)][**not federally enforceable**]

D. Requirements for Emission Units P002 (A) and P002 (B)

The following requirements are applicable to:

- Emission unit P002 (A), which is a 24 cubic foot Hopper where powder resins and filler materials are temporarily stored. Emissions from P002 (A) are controlled by air pollution control device C002 (A), which is a 9-bag Reverse Pulse MAC dust collector, Model No. 39AVSC9.
- Emission unit P002 (B), which are vessels used for mixing dry powder materials. Emissions from P002 (B) are controlled by air pollution control device C002 (B), which is a 12-cartridge pulse-jet Torit dust collector, Model No. 2DF-12-155. [Approval No. 721]

1. Emission Limitations

a. Opacity

The permittee shall not emit into the atmosphere, any air contaminant, for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]

2. Operating Requirements

a. C002 (A) and C002 (B) shall be operated according to their design specifications whenever P002(A) and P002(B) is in operation or is emitting air contaminants. [16.1]

b. In the case of malfunction of C002 (A) and C002 (B), all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C002 (A) and/or C002 (B) are expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P002 (A) and/or P002 (B) beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following:

- (1) Identification of the specific air pollution control system (i. e., C002 (A) and/or C002 (B)) and the source on which it is installed; (i. e., P002 (A) and/or P002 (B)),
- (2) The expected period of time that C002 (A) and C002 (B) will be malfunctioning or out of service;
- (3) The nature and quantity of air contaminants likely to be emitted during said period,
- (4) Measures that will be taken to minimize the length of the said period, and
- (5) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2]

3. Monitoring Requirements

a. Pressure drop across control devices C002 (A) and C002 (B) shall be monitored continuously. [29.6.3(b)]

4. Testing Requirements

a. Opacity

Tests for determining compliance with the opacity limitations specified in condition I.D.1.b of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1,1.3.2]

5. Recordkeeping Requirements

- a.** The permittee shall check the pressure drop across C002 (A) and C002 (B) a minimum of once per day and the date, time and a measurement shall be recorded. [29.6.3(b)]

E. Requirements for Emission Units P003 and P007

The following requirements are applicable to:

- Emission unit P003, which is an Ozalid three station mayer rod coating machine, Model No. K Machine used for coating polyester film and paper. P003 is equipped with three drying ovens, which have a combined heat input of 10 MMBTU/hr, and burn natural gas.
- Emission Unit P007, which is an Ozalid mayer rod coating machine, Model No. K, used for coating polyester film and paper. P007 is equipped with two drying ovens with a combined heat input of 7.2 MMBTU/hr that burn natural gas.
- P003 and P007 are associated with air pollution control device C037, which is a 25,000 scfm 7.00 MMBTU/hr Anguil regenerative thermal oxidizer, Model No. 250, which burns natural gas.

1. Emission Limitations

- a.** VOC emissions generated from P003 and P007 shall be captured and contained for discharge to C037. [Approval No. 210(a), 661 & 1786 (A)(1)]
- b.** Emissions from P003 and P007 shall not exceed 4.79 lbs VOC/gallon of solids as applied. [19.3.1]
- c.** VOC emissions generated from P003 and P007 shall be reduced by 98 percent or greater. This is to be achieved through a combination of 100 percent capture of the VOC generated by P003 and P007 and a 98 percent destruction of this VOC. [Approval No. 210(a), 661 & 1786 (A)(2), 19.3.2(a)]
- d.** The destruction efficiency of C037 for VOC shall be at least 98 percent. [Approval No. 210(a), 661 & 1786 (A)(3)]

- e. The total quantity of VOC discharged to C037 shall not exceed 350 lbs per hour, the maximum loading capacity of C037. [Approval No. 210(a), 661 & 1786 (A)(4)]
- f. The total quantity of VOC emissions discharged to the atmosphere from P003 and P007 shall not exceed 7.0 lbs per hour. [Approval No. 210(a), 661 & 1786 (A)(5)]

2. Operating Requirements

- a. The operating temperature of C037 shall be maintained at or above 1400°F whenever VOC is being discharged to C037, or at a lower temperature that has been demonstrated in the most recent compliance test to achieve the required destruction efficiency. [Approval No. 210(a), 661 & 1786 (B)(1)]
- b. P003 and P007 shall each be equipped with an interlock to prevent operation of P003 and P007 if the operating temperature of C037 is less than the temperature specified in Condition I.E.2.a. [Approval No. 210(a), 661 & 1786 (B)(2)]
- c. To ensure 100 percent capture of the VOC generated, P003 and P007 must be located within a total enclosure. This total enclosure must meet criteria for a permanent total enclosure in 40 CFR 51, Appendix M, Method 204 – “Criteria for and Verification of a Permanent or Temporary Total Enclosure”. [Approval No. 210(a), 661 & 1786 (B)(3)]
- d. All access doors and windows in the total enclosures for P003 and P007 shall be closed during routine operation of P003 and P007. Brief, occasional openings of doors to allow for access and inspection are acceptable. [Approval No. 210(a), 661 & 1786 (B)(4)]
- e. Air passing through any natural draft opening in the total enclosures for P003 and P007 shall flow into the enclosures continuously. [Approval No. 210(a), 661 & 1786 (B)(5)]
- f. All cleaning of P003 and P007 with VOC-containing material shall be conducted with C037 operating. VOC emissions generated during cleaning shall be captured and contained and discharged through C037 for destruction. [Approval No. 210(a), 661 & 1786 (B)(6)]
- g. C037 shall be operated according to its design specifications whenever P003 and/or P007 are in operation or are emitting air contaminants. [16.1]
- h. In the case of malfunction of C037, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C037 is expected or may reasonably be expected to continue for longer than 24 hours and if the permittee wishes to operate P003 and/or P007

beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [16.2, Approval No. 210(a), 661 & 1786 (G)(1)]

- (1) Identification of the specific air pollution control system (i.e., C037) and the source on which it is installed; (i.e., P003 and P007) [16.2(a), Approval No. 210(a), 661 & 1786 (G)(1)(a)]
 - (2) The expected period of time that C037 will be malfunctioning or out of service; [16.2(b), Approval No. 210(a), 661 & 1786 (G)(1)(b)]
 - (3) The nature and quantity of air contaminants likely to be emitted during said period, [16.2(c), Approval No. 210(a), 661 & 1786 (G)(1)(c)]
 - (4) Measures that will be taken to minimize the length of said period, and [16.2(d), Approval No. 210(a), 661 & 1786 (G)(1)(d)]
 - (5) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e), Approval No. 210(a), 661 & 1786 (G)(1)(e)]
- i. The permittee may seek to establish that a malfunction of C037 that would result in noncompliance with any of the terms in Section I.E of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval No. 210(a), 661 & 1786 (G)(2)]
- (1) The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error; [Approval No. 210(a), 661 & 1786 (G)(2)(a)]
 - (2) The malfunction was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; [Approval No. 210(a), 661 & 1786 (G)(2)(b)]
 - (3) Repairs were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. [Approval No. 210(a), 661 & 1786 (G)(2)(c)]
 - (4) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval No. 210(a), 661 & 1786 (G)(2)(d)]

- (5) Emissions during the period of time that the repairs were performed will not: [Approval No. 210(a), 661 & 1786 (G)(2)(e)]
 - (i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval No. 210(a), 661 & 1786 (G)(2)(e)(1)]
 - (ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval No. 210(a), 661 & 1786 (G)(2)(e)(2)]
- (6) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 210(a), 661 & 1786 (G)(2)(f)]
- (7) The permittee's action in response to the excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence. [Approval No. 210(a), 661 & 1786 (G)(2)(g)]

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction.

3. Monitoring Requirements

- a. The operating temperature of C037 shall be continuously monitored. [Approval No. 210(a), 661 & 1786 (C)(1)]

4. Testing Requirements

- a. Control efficiency of C037 will be determined using USEPA Reference method 25 or other methods approved by the Office of Air Resources and the USEPA. Calculations will be done on a solids applied basis. Continuous compliance will be maintained at all times. Compliance averaging times will be three hours. Once the control efficiency has been determined for any add-on control device by Reference Method 25, or any alternative method approved by the Office of Air Resources and the USEPA, compliance shall be determined on an instantaneous basis time period (e.g. determined control efficiency shall be used to calculate whether samples from the process meet the applicable emissions limit. [19.7.3]

5. Recordkeeping Requirements

- a. The permittee shall collect, record, and maintain all of the following information each month for P003, P007 and C037: [19.5.4(c), Approval No. 210(a), 661 & 1786 (E)(1)]
- (1) The name and identification number of each coating used on P003 and P007; [19.5.4(c)(1), Approval No. 210(a), 661 & 1786 (E)(1)(a)]
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating used; [19.5.4(c)(2)(i), Approval No. 210(a), 661 & 1786 (E)(1)(b)]
 - (3) The type and amount of solvent used for diluents and clean up operations; [19.5.4(c)(4), Approval No. 210(a), 661 & 1786 (E)(1)(c)]
 - (4) A log of operating time for C037, monitoring equipment, and P003 and P007; [19.5.4(c)(5), Approval No. 210(a), 661 & 1786 (E)(1)(d)]
 - (5) A maintenance log for C037 and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages; [19.5.4(c)(6), Approval No. 210(a), 661 & 1786 (E)(1)(e)]
 - (6) All 3-hour periods of operation in which the average combustion temperature of C037 was more than 50°F below the average combustion temperature during the most recent performance test that demonstrated **that** the facility was in compliance, and; [19.5.4(c)(7)(i), Approval No. 210(a), 661 & 1786 (E)(1)(f)]
 - (7) The operating temperature of C037. [19.5.4(c)(7)(ii), Approval No. 210(a), 661 & 1786 (C)(1) and (E)(1)(g)]

6. Reporting Requirements

- a. The permittee must notify the Office of Air Resources no later than 24 hours after an exceedance of any emission limitation is discovered. Notification shall include: [Approval No. 210(a), 661 & 1786 (E)(2)]
- (1) Identification of the emission limitation exceeded. [Approval No. 210(a), 661 & 1786 (E)(2)(a)]
 - (2) Suspected reason for the exceedance. [Approval No. 210(a), 661 & 1786 (E)(2)(b)]
 - (3) Corrective action taken or to be taken. [Approval No. 210(a), 661 & 1786 (E)(2)(c)]

- (4) Anticipated length of the exceedance. [Approval No. 210(a), 661 & 1786 (E)(2)(d)]
- b. The permittee shall notify the Office of Air Resources of any record showing noncompliance with Section I.E of this permit or any other air pollution control rule or regulation applicable to P003 and P007 by sending a copy of the record to the Office of Air Resources within 30 calendar days following the occurrence. [19.5.4(d)(1), Approval No. 210(a), 661 & 1786 (E)(3)]
- c. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of Section I.E of this permit or any other applicable air pollution control rules and regulations. [Approval No. 210(a), 661 & 1786 (E)(4)]
- d. The permittee, before changing the method of compliance to daily-weighted averaging, shall submit a Compliance Certification Plan to the Office of Air Resources for review and approval. Such plan shall include:
- (1) The name and location of the facility; [19.5.2(a)(1),]
- (2) The name, address and telephone number of the person responsible for the facility; [19.5.2(a)(2),]
- (3) The name and identification number of the emission units which will comply by means of daily weighted averaging; [19.5.2(a)(4)]
- (4) For daily-weighted averaging:
- (a) The instrument or method by which the permittee will accurately measure or calculate the volume of each coating (excluding water), as applied, used each day on each emission unit; [19.5.2(a)(5)]
- (b) The method by which the permittee will create and maintain records each day as required by Subsection 19.5.2(c) of APC Regulation No. 19; [19.5.2(a)(6)]
- (c) The time at which the facility's day begins if a time other than midnight local time is used to define a day. [19.5.2(a)(7)]
- (5) Information describing the effect of the change on the emissions of any air contaminant. [9.2.1]
- (6) A demonstration that emissions from the stationary source will not cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by APC Regulation No. 22. [22.3.3(a)][**not federally enforceable**]

7. Other Permit Conditions

- a. To the extent consistent with the requirements of Section I.E of this permit and applicable federal and state laws, the equipment shall be designed, constructed and operated in accordance with the representation of the equipment in the permit application as prepared by Arkwright, Inc. dated 21 September 2003, as amended. [Approval No. 210(a), 661 & 1786 (F)(1)]
- b. The permittee shall shut down P003 and P007 in the event of a malfunction of the emission capture systems and/or C037 that results in or that could result in, emissions in excess of the permit limits. P003 and P007 shall remain shutdown until the malfunction has been identified and corrected. [Approval No. 210(a), 661 & 1786 (F)(2)]
- c. There shall be no bypassing of the C037 during times when VOC is being discharged to the control device. [Approval No. 210(a), 661 & 1786 (F)(3)]
- d. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. [Approval No. 210(a), 661 & 1786 (F)(7)]

F. Requirements for Emission Units P005, L001 and L003

The following requirements are applicable to:

- Emission unit P005, which is a Polytype coating machine, used for coating polyester film and paper. P005 is equipped with one drying oven, with a heat input of 6.0 MMBTU/hr, and burns natural gas.
- Emission unit L001, which is a Magnat Lenox I gravure coating machine, used for coating polyester film and paper. L001 is equipped with one drying oven, with a heat input of 2.0 MMBTU/hr, and burns natural gas.
- Emission unit L003, which is a Magnat Lenox I gravure coating machine, used for coating polyester film and paper. L003 is equipped with one drying oven, with a heat input of 2.0 MMBTU/hr, and burns natural gas.
- Emission units P005, L001 and L003 are associated with air pollution control device C005 which is a 15000 scfm, 4.8 MMBTU/hr Smith Environmental Corporation catalytic oxidizer, Model No. SEC-CD70, and burns natural gas.

1. Emission Limitations

- a. Emissions from P005, L001 and L003 shall not exceed 4.79 lbs VOC/gallon of solids as applied. [19.3.1]
- b. All VOC emissions generated from emission units P005, L001 and L003 shall be captured and contained for discharge to C005. [Approval No. 1482(A)(1)]
- c. Compliance with the emission limitation in condition I.F.1.a of this permit shall be achieved with air pollution control device C005. VOC emissions generated from emissions units P005, L001 and L003 shall be reduced by 95%. This is to be achieved through a combination of 100% capture of the VOC generated by the equipment and a 95% destruction of this VOC. The destruction efficiency of the catalytic incinerator for VOC shall be at least 95%. [Approval No. 1482(A)(2,3), 19.3.2(a)]
- d. The total quantity of VOC emissions discharged to C005 from emission units P005, L001 and L003 shall not exceed 250 lbs. per hour, the maximum loading capacity in lbs/hr of C005. [Approval No. 1482(A)(4)]

2. Operating Requirements

- a. The inlet temperature to C005 shall be maintained at or above 650°F whenever VOC is being discharged to C005. [Approval No. 1482(B)(1)]
- b. The outlet temperature to C005 shall never exceed 1300°F. [Approval No. 1482(B)(2)]
- c. There shall be no bypassing of control device C005 during times when VOC is being discharged to C005. [Approval No. 1482(F)(3)]
- d. Emission units P005, L001 and L003 shall each be equipped with an interlock to prevent operation of the equipment if the inlet temperature to C005 is less than 650°F. [Approval No. 1482(B)(3)]
- e. All access doors and windows in the coating room that contains emission unit P005 shall be closed during routine operation of the coating equipment. Brief occasional openings of doors to allow for entering and exiting the coating room is acceptable. [Approval No. 1482(B)(4)]
- f. Air passing through any opening in the coating room that contains P005 shall flow into the room continuously. [Approval No. 1482(B)(5)]

- g. All access doors and windows in each permanent total enclosure for L001 and L003 shall be closed during routine operation of the coating equipment. Brief occasional openings of doors to allow for entering and exiting each total enclosure is acceptable. [Approval No. 1482(B)(6)]
- h. Air passing through any opening in each permanent total enclosure for L001 and L003 shall flow into the total enclosure continuously. [Approval No. 1482(B)(7)]
- i. All cleaning of P005, L001 and L003 with VOC containing materials shall be conducted with C005 operating. VOC emissions generated during cleaning shall be captured, contained, and discharged through C005 for destruction. [Approval No. 1482(B)(8)]
- j. C005 shall be operated according to its design specifications whenever P005, L001 and L003 is in operation or is emitting air contaminants. [16.1]
- k. The permittee shall shut down emission units P005, L001 and L003 in the event of malfunction of the emission capture system and/or C005 that results in or could result in, emissions in excess of the permit limits. The units shall remain shut down until the malfunction has been identified and corrected. [Approval No. 1482(F)(2), 16.2]

3. Monitoring Requirements

- a. The inlet and outlet temperature of C005 shall be continuously monitored. [Approval No. 1482(C)(1)]

4. Testing Requirements

- a. Control efficiency of C005 will be determined using USEPA Reference method 25 or other methods approved by the Office of Air Resources and the USEPA. Calculations will be done on a solids applied basis. Continuous compliance will be maintained at all times. Compliance averaging times will be three hours. Once the control efficiency has been determined for any add-on control, devices by Reference Method 25, or any alternative method approved by the Office of Air Resources and the USEPA, compliance shall be determined on an instantaneous basis time period (e.g. determined control efficiency shall be used to calculate whether samples from the process meet the applicable emission limit. [19.7.3]

5. Recordkeeping Requirements

- a. The permittee shall collect, record and maintain all of the following information each month for emission units P005, L001, L003 and control device C005:
 - (1) The name and identification number of each coating used on P005, L001 and L003; [Approval No. 1482(E)(1)(a), 19.5.4(c)(1)]

- (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied and the volume, as applied, of each coating used; [19.5.4(c)(2)(i)]
- (3) The type and amount of solvent used for diluents and clean up operations; [Approval No. 1482(E)(1)(b), 19.5.4(c)(4)]
- (4) A log of operating time for the capture system, monitoring equipment, emission units P005, L001, L003 and control device C005. [Approval No. 1482(E)(1)(c), 19.5.4(c)(5)]
- (5) A maintenance log for the capture system, monitoring equipment, and control device C005 detailing all routine and non-routine maintenance performed including dates and duration of any outages; [Approval No. 1482(E)(1)(d), 19.5.4(c)(6)]
- (6) For control device C005: [Approval No. 1482(E)(1)(e), 19.5.4(c)(8)]
 - (a) All periods where the temperature increase across the catalyst bed is less than 80% of the temperature increase recorded during the most recent performance test that demonstrated that the facility was in compliance, and [Approval No. 1482(E)(1)(e)(1), 19.5.4(c)(8)(i)]
 - (b) The inlet and outlet temperatures and temperature rise across the catalyst bed. [Approval No. 1482(E)(1)(e)(2), 19.5.4(c)(8)(ii)]
- b. The permittee shall maintain a record of all measurements, performance evaluations, calibration checks and maintenance or adjustments for each continuous monitor. [Approval No. 1482(E)(6)]
- c. The permittee shall continuously record the inlet and outlet temperature of C005 [Approval No. 1482(C)(1)]

6. Reporting Requirements

- a. The permittee shall notify the Director of any record showing noncompliance with the terms in Section I.F of this permit or any other air pollution control rule or regulation applicable to emission units P005, L001 and L003 by sending a copy of the record to the Director within 30 days following the occurrence. [Approval No. 1482(E)(3), 19.5.4(d)(1)]
- b. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms in Section I.F. of this permit or any other applicable air pollution control rules and regulations. [Approval No. 1482(E)(4)]
- c. The permittee must notify the Office of Air Resources no later than 24 hours after an exceedance of any emission limitation is discovered. Notification shall include: [Approval No. 1482(E)(2)]

- (1) Identification of the emission limitation exceeded
 - (2) Suspected reason for exceedance
 - (3) Corrective action taken or to be taken
 - (4) Anticipated length of the exceedance
- d. The permittee, before changing the method of compliance to daily-weighted averaging, shall submit a Compliance Certification Plan to the Office of Air Resources for review and approval. Such plan shall include:
- (1) The name and location of the facility; [19.5.2(a)(1), 19.5.3(a)(1)]
 - (2) The name, address and telephone number of the person responsible for the facility; [19.5.2(a)(2), 19.5.3(a)(2)]
 - (3) The name and identification number of the emission units which will comply by means of daily weighted averaging ; [19.5.2(a)(4)]
 - (4) For daily-weighted averaging:
 - (a) The instrument or method by which the permittee will accurately measure or calculate the volume of each coating (excluding water), as applied, used each day on each emission unit; [19.5.2(a)(5)]
 - (b) The method by which the permittee will create and maintain records each day as required by Subsection 19.5.2(c) of APC Regulation No. 19; [19.5.2(a)(6)]
 - (c) The time at which the facility's day begins if a time other than midnight local time is used to define a day. [19.5.2(a)(7)]
 - (5) Information describing the effect if the change on the emissions of any air contaminant. [9.2.1]
 - (6) A demonstration that emissions from the stationary source will not cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by APC Regulation No. 22. [22.3.3(a)] **[not federally enforceable]**

7. Other Permit Conditions

- a. To the extent consistent with the requirements of this section and applicable federal and state laws, the equipment shall be operated in accordance with the representation of the equipment in the preconstruction permit application. [Applicable No. 1482(F)(1)]

G. Requirements for Emission Unit P006

The following requirements are applicable to:

- Emission unit P006, which is an Ozalid mayer rod coating machine, Model No. K Machine used for coating polyester film and paper. P006 is equipped with two drying ovens, with a combined heat input of 6 MMBTU/hr, and burn natural gas. [Approval No. 32]

1. Emission Limitations

- a. The VOC content of each coating used by the permittee on P006, shall not exceed 2.9 lbs. VOC/gallon of coating, minus water. [19.3.1, 19.3.2.(b)]

2. Testing Requirements

- a. Compliance with the coating emission limitation contained in Condition I.G.1.a of this permit shall be demonstrated in accordance with 40 CFR 60, Appendix A, Methods 24, 24A as amended or any other USEPA approved method which has been accepted by the Director. A one-hour bake time shall be used for Methods 24 and 24A, which apply to multi-component coatings. [19.7.1]

3. Recordkeeping Requirements

- a. The permittee shall collect, record, and maintain all of the following information each month for P006: [19.5.3(c)]
 - (1) The name and identification number of each coating, as applied, on P006, and [19.5.3(c)(1)]
 - (2) The mass of VOC per volume of each coating (excluding water), as applied, used each month on P006. [19.5.3(c)(2)]
 - (3) The type and amount of solvent used for diluents and cleanup operations. [19.5.3(c)(3)]

4. Reporting Requirements

- a.** The permittee shall notify the Director of any record showing use of any non-complying coatings by sending a copy of such record to the Director within 30 calendar days following that use, and, [19.5.3(d)(1)]
- b.** The permittee, before changing from complying coatings to daily-weighted averaging or control devices, shall submit a Compliance Certification Plan to the Office of Air Resources for review and approval. Such plan shall include:
 - (1)** The name and location of the facility; [19.5.2(a)(1), 19.5.4(a)(1)]
 - (2)** The name, address and telephone number of the person responsible for the facility; [19.5.2(a)(2), 19.5.4(a)(2)]
 - (3)** The name and identification number of the emission units which will comply by means of daily-weighted averaging or control devices; [19.5.2(a)(4), 19.5.4(a)(3)]
 - (4)** For daily-weighted averaging:
 - (a)** The instrument or method by which the permittee will accurately measure or calculate the volume of each coating (excluding water), as applied, used each day on each emission unit; [19.5.2(a)(5)]
 - (b)** The method by which the permittee will create and maintain records each day as required by Subsection 19.5.2(c) of APC Regulation No. 19; [19.5.2(a)(6)]
 - (c)** The time at which the facility's day begins if a time other than midnight local time is used to define a day. [19.5.2(a)(7)]
 - (5)** For control devices:
 - (a)** The name and identification number of each coating, as applied, on each coating line or operation; [19.5.4(a)(4)]
 - (b)** The mass of VOC per volume coating solids applied and the gallons of solids of each coating applied; [19.5.4(a)(5)]
 - (c)** Identification of each control device which will be or has been installed and date of installation; [19.5.4(a)(6)]
 - (d)** Identification of coating lines which will be controlled by each control device and documentation of expected capture and destruction efficiency or reduction efficiency; [19.5.4(a)(7)]

- (e) Control device design information;
 - (i) For thermal incinerators – design combustion temperature (°F); [19.5.4(a)(8)(I)]
 - (ii) For catalytic incinerators – design exhaust gas temperature (°F), design temperature rise across catalyst bed (°F), anticipated frequency of catalyst change, and catalyst changes; [19.5.4(a)(8)(ii)]
 - (iii) For condensers – design inlet temperature of cooling medium (°F), design exhaust gas temperature (°F); [19.5.4(a)(8)(iii)]
 - (iv) For carbon adsorbers – design pressure drop across the adsorber, VOC concentration at breakthrough. [19.5.4(a)(8)(iv)]
- (6) Information describing the effect of the change on the emissions of any contaminant. [9.2.1]
- (7) A demonstration that emissions from the stationary source will not cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by APC Regulation No. 22. [22.3.3(a)] **[Not Federally Enforceable]**

H. Requirements for Emission Unit P012

The following requirements are applicable to:

- Emission unit P012, which is a Black Clawson three-headed surface coating machine, Model No. E-1793 used for coating polyester film and paper. P012 is equipped with three drying ovens, which have a combined heat input of 13.5 MMBTU/hr, and burn natural gas. P012 is associated with air pollution control device C012, which is a 34,545 acfm, 34.2 MMBTU/hr Smith Engineering Co. catalytic incinerator, Model No. Q#01-88-290-2, that burns natural gas.

1. Emission Limitations

- a. All VOC emissions generated from P012 shall be captured and contained for discharge to C012. [Approval Nos. 1062-1063(A)(1)(a)]
- c. Compliance with the emission limitation in condition I.H.1.a. of this permit shall be achieved through the use of air pollution control device C012. The overall

control efficiency of C012 shall be at least 98 percent. This is to be achieved through a combination of 100 percent capture of the VOC generated from P012 and 98 percent destruction of this VOC in C012. [Approval Nos. 1062 - 1063(A)(1)(b), 19.3.2(a)]

- d. The total quantity of VOC applied to the substrate shall not exceed 814,680 lbs. per month (12 month rolling average). [Approval Nos. 1062 - 1063(A)(1)(c)]
- e. The use of coatings containing VOC greater than 239 lbs. per gallon of solids applied should have prior approval of this Office. An overall control efficiency of 98 percent would allow the use of coatings containing 239 lbs. VOC per gallon of solids applied and still maintain emissions below 4.79 lbs. VOC per gallon of solids applied. Use of such coatings may be permitted if the permittee can demonstrate that overall efficiencies greater than 98 percent are being achieved. [Approval Nos. 1062 - 1063(A)(1)(d), 19.3.1]

2. Operating Requirements

- a. The inlet temperature to the catalyst bed shall be maintained at or above 700°F whenever VOC is being discharged to C012. [Approval Nos. 1062 - 1063(B)(1)]
- b. The outlet temperature from the catalyst bed shall never exceed 1250°F. [Approval Nos. 1062 - 1063(B)(2)]
- c. C012 shall be equipped with an interlock to prevent operation of P012 if the inlet temperature to the catalyst bed is less than 700°F. [Approval Nos. 1062 - 1063(B)(3)]
- d. All access doors and windows in the capture system shall be closed during routine operation of P012. Brief, occasional openings of such doors or windows to allow for adjustments of the surface coating machine are acceptable. [Approval Nos. 1062 - 1063(B)(4)]
- e. Air passing through any opening in P012 shall flow into the enclosure continuously. [Approval Nos. 1062 - 1063(B)(5)]
- f. To ensure 100 percent capture of the VOC generated, P012 must be equipped with a total enclosure. This total enclosure must meet the criteria for a permanent total enclosure contained in 40 CFR Part 51, Appendix M, Method 204 – “Criteria For and Verification of a Permanent or Temporary Total Enclosure”. [Approval Nos. 1062 - 1063(B)(6)]
- g. All cleaning of P012 with VOC containing material shall be conducted with the capture system operating. VOC emissions generated during cleaning shall be captured and contained and discharged through C012 for destruction. [Approval Nos. 1062 - 1063(B)(7)]

- h. C012 shall be operated according to its design specifications whenever P012 is in operation or is emitting air contaminants. [16.1]
- i. The permittee shall shut down emission unit P012 in the event of malfunction of the emission capture system and/or C012 that results in or that could result in, emissions in excess of the permit limits. The units shall remain shutdown until the malfunction has been identified and corrected. [Approval Nos. 1062 - 1063(F)(2), 16.2]

3. Monitoring Requirements

- a. The inlet and outlet gas temperature of the catalyst bed shall be continuously monitored. [Approval Nos. 1062 - 1063(C)(1)]

4. Testing Requirements

- a. Control efficiency of C012 will be determined using USEPA Reference method 25 or other methods approved by the Office of Air Resources and the USEPA. Calculations will be done on a solids applied basis. Continuous compliance will be maintained at all times. Compliance averaging times will be three hours. Once the control efficiency has been determined for any add-on control device by Reference Method 25, or any alternative method approved by the Office of Air Resources and the USEPA, compliance shall be determined on an instantaneous basis time period (e.g. determined control efficiency shall be used to calculate whether samples from the process meet the applicable emission limit.) [19.7.3]

5. RecordKeeping Requirements.

- a. The permittee shall collect, record, and maintain the following information each month for P012 and the air pollution control device C012: [Approval Nos. 1062 - 1063 (E)(1)]
 - (1) The name and identification number of each coating used on P012; [Approval Nos. 1062 - 1063(E)(1)(a), 19.5.4(c)(1)]
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating used each month on P012; [Approval Nos. 1062 - 1063(E)(1)(b), 19.5.4(c)(2)(i)]
 - (3) The type and amount of solvent used for diluents and clean up operations: [Approval Nos. 1062 - 1063(E)(1)(c), 19.5.4(c)(4)]
 - (4) A log of operating time for the capture system, C012, monitoring equipment and P012. [Approval Nos. 1062 - 1063(E)(1)(d), 19.5.4(c)(5)]

- (5) A maintenance log for the capture system, C012, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages; [Approval Nos. 1062 - 1063(E)(1)(e), 19.5.4(c)(6)]
- (6) For C012:
 - (a) All periods where the temperature increase across the catalyst bed is less than 80% of the temperature increase recorded during the most recent performance test that demonstrated that the facility was in compliance, and [Approval Nos. 1062-1063(E)(1)(f)(1), 19.5.4(c)(8)(i)]
 - (b) The inlet and outlet temperature and temperature rise across the catalyst bed. [Approval Nos. 1062-1063 (E)(1)(f)(2), 19.5.4(c)(8)(ii)]
 - (c) The date when the catalyst bed is replaced.[Approval Nos. 1062-1063(E)(1)(f)(3)]
- b. The permittee shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC applied to the substrate for the previous 12 months. The permittee shall keep records of this determination and provide such records to the Office of Air Resources upon request. [Approval Nos. 1062 - 1063(E)(2)]
- c. The permittee shall continuously record the temperature of C012. [Approval Nos. 1062 - 1063(C)(1)]

6. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources, within 15 days, whenever the total quantity of VOC applied to the substrate exceeds 814,680 lbs. per month (12 month rolling average). [Approval Nos. 1062 - 1063(E)(3)]
- b. The permittee must notify the Office of Air Resources no later than 24 hours after an exceedance of any emission limitation is discovered. Notification shall include: [Approval Nos. 1062 - 1063(E)(4)]
 - (1) Identification of emission limitation exceeded
 - (2) Suspected reason for the exceedance
 - (3) Corrective action taken or to be taken
 - (4) Anticipated length of the exceedance

- c. The permittee shall notify the Office of Air Resources of any record showing noncompliance with Section I.H of this permit or any other air pollution control rule or regulation applicable to emission unit P012 by sending a copy of the record to the Office of Air Resources within 30 calendar days following the occurrence. [Approval Nos. 1062 - 1063(E)(5), 19.5.4(d)(1)]
- d. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with Section I.H of this permit or any other applicable air pollution control rules and regulations. [Approval Nos. 1062 - 1063(E)(6)]
- e. The permittee shall notify the Office of Air Resources in writing of the actual start-up of C012 no later than 15 days after such date. [Approval Nos. 1062-1063(E)(7)]
- f. The permittee, before changing the method of compliance to daily- weighted averaging, shall submit a Compliance Certification Plan to the Office of Air Resources for review and approval. Such plan shall include:
 - (1) The name and location of the facility; [19.5.2(a)(1), 19.5.3(a)(1)]
 - (2) The name, address and telephone number of the person responsible for the facility; [19.5.2(a)(2), 19.5.3(a)(2)]
 - (3) The name and identification number of the emission units which will comply by means of daily weighted averaging; [19.5.2(a)(4), 19.5.3(a)(3)]
 - (4) For daily-weighted averaging:
 - (a) The instrument or method by which the permittee will accurately measure or calculate the volume of each coating (excluding water), as applied, used each day on each emission unit; [19.5.2(a)(5)]
 - (b) The method by which the permittee will create and maintain records each day as required by Subsection 19.5.2(c) of APC Regulation No. 19; [19.5.2(a)(6)]
 - (c) The time at which the facility's day begins if a time other than midnight local time is used to define a day. [19.5.2(a)(7)]
 - (5) A demonstration that emissions from the stationary source will not cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by APC Regulation No.22. [22.3.3(a)] [**Not Federally Enforceable**]

7. Other Permit Conditions

- a. To the extent consistent with the requirements of this permit and applicable federal and state laws, the equipment shall be operated in accordance with the representation of the equipment in the preconstruction permit application. [Approval Nos. 1062 - 1063(F)(1)]
- b. There shall be no bypassing of C012 during times when VOC is being discharged to the device. [Approval Nos. 1062-1063(F)(3)]
- c. The permittee shall, on an annual basis, conduct testing, using equipment manufacturer's recommended procedures, to determine if the catalyst bed in the control device requires replacement. Testing to evaluate the catalyst bed shall not be considered compliance testing. A copy of the results of this testing shall be submitted to the Office of Air Resources within 30 days of completion of the testing. Any catalyst bed determined to be in need of replacement shall be replaced as expeditiously as practicable. [Approval Nos. 1062-1063(F)(4)]

I. Requirements for Emission Unit P013

The following requirements are applicable to:

- Emission unit P013, which is a Safety Kleen remote reservoir cold cleaning degreaser, Model No. 17.4C.

1. Operating Requirements

- a. Covers and dipping/rotating baskets shall be constructed of nonporous or nonabsorbent material. Covers must form a tight seal with the sides of P013 and have no gaps or holes. [36.4.1]
- b. When the cover of P013 is open, drafts at the same elevation as the tanks lip must not be greater than 40 m/min. (130 ft/min.) when measured 1 to 2 meters (3 to 7 feet) upwind. [36.4.2]
- c. Leaks shall be repaired immediately or P013 shall be shut down [36.4.3]
- d. P013 shall display a conspicuous summary of proper operating procedures consistent with minimizing emissions of organic solvents. [36.4.4]
- e. Any solvent spray must be a solid, fluid stream which is delivered at a pressure no greater than 10 pounds per square inch (psi) and which does not cause excessive splashing. [36.4.5]
- f. Spills shall be wiped up immediately. The wipe rags shall be stored in covered containers. [36.4.6]

- g.** Porous or absorbent materials, such as sponges, fabrics, wood, or paper products, shall not be cleaned in P013. [36.4.7]
- h.** Parts baskets or parts shall be drained under the cover and shall not be removed from P013 for at least 15 seconds or until dripping ceases and the pieces are visually dry, whichever is longer. [36.4.8]
- i.** Parts with cavities or blind holes shall be tipped or rotated while draining before removed from the vapor zone. [36.4.9]
- j.** Parts shall be oriented for best drainage. [36.4.10]
- k.** When solvent is added to or drained from P013, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface. [36.4.11]
- l.** Solvent, waste solvent, still bottoms, and sump bottoms shall be stored in covered containers and waste solvent transferal or disposal shall not allow greater than 20 percent of the waste solvent (by weight) to evaporate into the atmosphere. [36.4.12]
- m.** P013 shall be maintained as recommended by the manufacturer of the equipment. [36.4.13]
- n.** Operators must receive training in proper solvent cleaning procedures and, if requested by representatives of the Office of Air Resources or the USEPA during an inspection, shall complete and pass the applicable sections of the test on those procedures as shown in Appendix A of APC Regulation No. 36. [36.4.14]
- o.** P013 shall be equipped with an attached cover that can be operated easily with one hand. The covers shall be closed at all times except during parts entry and removal. If the unit is equipped with a lip exhaust, the cover shall be located below the lip exhaust. [36.5.1]
- p.** A freeboard ratio greater than or equal to 0.75 shall be used to control solvent emissions from P013. [36.5.3]
- q.** If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard zone of P013. [36.5.4]

2. Recordkeeping Requirements

- a.** The permittee shall maintain the following records:

 - (1)** Training provided to the operators of P013 for the lifetime of the unit, [36.10.4]

- (2) The amount and type of solvent used in P013 for each year, and [36.10.4(a)]
- (3) The date and type of each equipment malfunction or leak and the date the malfunction or leak is repaired. [36.10.4(b)]

J. Facility Requirements

1. Emission Limitations

- a. The permittee shall limit actual emissions of NO_x to no more than 50 tons per year over every consecutive twelve-month period. [Consent Agreement No. 95-42-AP(5), 27.2.2(a)]
- b. If the emission limitation in Condition I.J.1.a is exceeded the permittee shall immediately be in compliance with Reasonably Available Control Technology (RACT), pursuant to APC Regulation 27, Section 27.4. Failure to immediately comply with Section 27.4 shall subject the permittee to enforcement actions, which may include monetary penalties. [Consent Agreement No. 95-42-AP(7)]

2. Recordkeeping Requirements

- a. The permittee shall demonstrate compliance with the emission limitations set forth in Condition I.J.1.a by complying with the following recordkeeping requirements: [Consent Agreement No. 95-42-AP (6)(A)]
 - (1) The permittee shall measure and record total facility fuel usage on a monthly basis. [Consent Agreement No. 95-42-AP(5), 95-42-AP(6)(A), June 30, 1994 letter from R.J. Kizior of Arkwright to RIDEM]
 - (2) The permittee shall on a monthly basis, no later than fifteen (15) days after the first of each month, determine the quantity of NO_x emitted for the previous twelve (12) month period for the entire facility. The quantity of NO_x emitted shall be determined by methods approved by the Office of Air Resources. [Consent Agreement No. 95-42-AP(6)(B), June 30, 1994 letter from R.J. Kizior of Arkwright to RIDEM]

3. Reporting Requirements

- a. The permittee must submit an initial notification to the USEPA Regional Office and to the Office of Air Resources no later than 1 year before the compliance date of December 5, 2005 (December 5, 2004). [40 CFR 63.3400(b)(1), 40 CFR 63.3330(a)]
 - (1) The initial notification shall provide the following information: [40 CFR 63.9(b)(2)]

- (a) The name and address of the permittee; [40 CFR 63.9(b)(2)(i)]
 - (b) The address (i.e., physical location) of the affected source; [40 CFR 63.9(b)(2)(ii)]
 - (c) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; [40 CFR 63.9(b)(2)(iii)]
 - (d) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and [40 CFR 63.9(b)(2)(iv)]
 - (e) A statement of whether the affected source is a major source or an area source. [40 CFR 63.9(b)(2)(v)]
- b. The permittee shall notify the Office of Air Resources, in writing within thirty (30) days of the end of the month, whenever NO_x emissions exceed fifty (50) tons during the previous twelve (12) months. [Consent Agreement No. 95-42-AP (6)(C), 27.6.9(c)]

K. Alternative Operating Scenario I

- Emission unit P001, which is a Dixon Research and Development (R&D) coating machine, used for coating polyester film and paper. P001 is used for both R&D operations and production purposes. P001 is equipped with one drying oven, with a heat input of 2.4 MMBTU/hr, and burns natural gas. The following requirements are applicable when P001 is used for research and development purposes.

1. Emission Limitations

- a. VOC emissions from P001 when utilized for R&D operations only shall be limited to no more than 1,666 pounds in any one calendar month. [Consent Agreement No. 98-03-AP-CA(8), 19.2.5(a)]

2. Operating Requirements

- a. If the emission limitation in Condition I.K.1.a is exceeded, the permittee shall immediately comply with the emission limitation specified in Condition I.C.1.a. Failure to immediately comply with this emission limitation shall subject the permittee to enforcement actions, which may include monetary penalties. [Consent Agreement No. 98-03-AP-CA(9), 19.2.5(c)]

3. Recordkeeping Requirements

- a. The permittee when utilizing emission unit P001 for R&D purposes shall comply with the following record keeping: [Consent Agreement No. 98-03-AP(10)]
- (1) The name, identification number and amount used each month of each coating, as applied, on P001; [Consent Agreement No. 98-03-AP(10)(A), 19.2.5(b)(1)]
 - (2) The mass of VOC per volume (excluding water), as applied, for each coating used on P001; [Consent Agreement No. 98-03-AP(10)(B), 19.2.5(b)(2)]
 - (3) The type and amount of solvent used for diluents and cleanup operations. [Consent Agreement No. 98-03-AP(10)(C), 19.2.5(b)(3)]

L. Alternative Operating Scenario II

- Emission units P003 and P007 are capable of bypassing the afterburner (C037), when using compliant coatings. The following requirements are applicable in that situation:

1. Emission limitations

- a. The VOC content of each coating used by the permittee shall not exceed the following emissions limitations: [19.3.1]

<u>Type of Surface</u>	<u>Coating VOC Content (lbs. VOC/gal of coating minus water, as applied)</u>
Paper and Plastic Films	2.9

2. Testing Requirements

- a. Compliance with the coating emission limitations contained in Condition I.L.1.a of this permit shall be demonstrated in accordance with 40 CFR 60, Appendix A, Methods 24, 24A as amended or any other USEPA approved method which has been accepted by the Director. A one hour bake time shall be used for Methods 24 and 24A, which apply to multi-component coatings. [19.7.1]

3. Recordkeeping Requirements

- a. The permittee shall collect, record and maintain the following information each month for P003 and P007:

- (1) The name and identification number of each coating, as applied, on emission unit P003 and P007; [19.5.3(c)(1)]
 - (2) The VOC content of each coating, in pounds of VOC per gallon of coating minus water, as applied; [19.5.3(c)(2)]
 - (3) The type and amount of solvent used for diluents and clean up operations; [19.5.3(c)(4)]
- b. The permittee shall, contemporaneously when making a change from this operating scenario to another, record in a log at the facility a record of the scenario under which it is operating. [29.6.7(a)]

4. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any record showing noncompliance with section I.L of this permit or any other air pollution control rule or regulation applicable to emission units P003 and P007, by sending a copy of the record to the Office of Air Resources within 30 days following the occurrence. [19.5.3(d)(1)]

M. Alternative Operating Scenario III

- Emission unit P005 is capable of bypassing the afterburner (C005), when using compliant coatings. The following requirements are applicable in that situation:
- Emission unit L001 is capable of bypassing the afterburner (C005), when using compliant coatings. The following requirements are applicable in that situation:
- Emission unit L003 is capable of bypassing the afterburner (C005), when using compliant coatings. The following requirements are applicable in that situation:

1. Emission limitations

- a. The VOC content of each coating used by the permittee, shall not exceed the following emissions limitations: [19.3.1]

<u>Type of Surface</u>	<u>Coating VOC Content (lbs. VOC/gal of coating minus water, as applied)</u>
Paper and Plastic Films	2.9

2. Testing Requirements

- a. Compliance with the coating emission limitations contained in Condition I.M.1.a of this permit shall be demonstrated in accordance with 40 CFR 60, Appendix A, Methods 24, 24A as amended or any other USEPA approved method which has been accepted by the Director. A one hour bake time shall be used for Methods 24 and 24A, which apply to multi-component coatings. [19.7.1]

3. Recordkeeping Requirements

- a. The permittee shall collect, record and maintain the following information each month for P005, L001 and L003:
 - (1) The name and identification number of each coating, as applied, on emission unit P005, L001 and L003; [19.5.3(c)(1)]
 - (2) The VOC content of each coating, in pounds of VOC per gallon of coating minus water, as applied; [19.5.3(c)(2)]
 - (3) The type and amount of solvent used for diluents and clean up operations; [19.5.3(c)(4)]
- b. The permittee shall, contemporaneously when making a change from this operating scenario to another, record in a log at the facility a record of the scenario under which it is operating. [29.6.7(a)]

4. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any record showing noncompliance with section I.M. of this permit or any other air pollution control rule or regulation applicable to emission unit P005, L001 and L003, by sending a copy of the record to the Office of Air Resources within 30 days following the occurrence. [19.5.3(d)(1)]

N. Alternative Operating Scenario IV

- Emission unit P012 is capable of bypassing the afterburner (C012), when using compliant coatings. The following requirements are applicable in that situation:

1. Emission limitations

- a. The VOC content of each coating used by the permittee, shall not exceed the following emissions limitations: [19.3.1]

<u>Type of Surface</u>	<u>Coating VOC Content (lbs. VOC/gal of coating minus water, as applied)</u>
Paper and Plastic Films	2.9

2. Testing Requirements

- a. Compliance with the coating emission limitations contained in Condition I.N .1.a of this permit shall be demonstrated in accordance with 40 CFR 60, Appendix A, Methods 24, 24A as amended or any other USEPA approved method which has been accepted by the Director. A one hour bake time shall be used for Methods 24 and 24A, which apply to multi-component coatings. [19.7.1]

3. Recordkeeping Requirements

- a. The permittee shall collect, record and maintain the following information each month for P012:
 - (1) The name and identification number of each coating, as applied, on emission unit P007; [19.5.3(c)(1)]
 - (2) The VOC content of each coating, in pounds of VOC per gallon of coating minus water, as applied; [19.5.3(c)(2)]
 - (3) The type and amount of solvent used for diluents and clean up operations; [19.5.3(c)(4)]
- b. The permittee shall, contemporaneously when making a change from this operating scenario to another, record in a log at the facility a record of the scenario under which it is operating. [29.6.7(a)]

4. Reporting Requirements

- a. The permittee shall notify the Office of Air Resources of any record showing noncompliance with section I.N of this permit or any other air pollution control rule or regulation applicable to emission unit P012 by sending a copy of the record to the Office of Air Resources within 30 days following the occurrence. [19.5.3(d)(1)]

SECTION II. GENERAL CONDITIONS

A. Annual Emissions Fee Payment

The permittee shall pay an annual emissions fee as established in Air Pollution Control Regulation No. 28 "Operating Permit Fees." [29.6.8(d)]

B. Permit Renewal and Expiration

This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 12 months prior to the date of permit expiration. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the Office of Air Resources on the renewal application. In such an event, the permit shield in condition II.Y of this permit shall extend beyond the original permit term until renewal. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by the Office of Air Resources any additional information identified as being needed to process the application. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. [29.6.8(a), 29.4.2(c), 29.4.6]

C. Transfer of Ownership or Operation

This permit is nontransferable by the permittee. Future owners and operators must obtain a new operating permit from the Office of Air Resources. A change in ownership or operational control of this source is treated as an administrative permit amendment if no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Office of Air Resources. [29.10.1(a)(4)]

D. Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [29.6.8(c)(4)]

E. Submissions

1. Reports, test data, monitoring data, notifications, and requests for renewal shall be submitted to:

RIDEM - Office Air Resources
Compliance Assurance Section
235 Promenade St. Room 230
Providence, RI 02908

2. Any records, compliance certifications and monitoring data required by the provisions of this permit to be submitted to USEPA shall be sent to:

USEPA Region I
Office of Environmental Stewardship
Director, Air Compliance Program
Attn: Air Compliance Clerk
One Congress St. Suite 1100 (SEA)
Boston, MA 02114-2023

3. Any document submitted shall be certified as being true, accurate, and complete by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements, and information in the certification are true, accurate, and complete. [29.6.8(e)]

F. Inspection and Entry

1. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter this facility at all reasonable times for the purpose of: [29.6.8(f)(1), Approval Nos. 1482(F)(4), 1062 - 1063(F)(4)]
 - a. having access to and copying at reasonable times any records that must be kept under the conditions of this permit; [29.6.8(f)(2)]
 - b. inspecting at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and [29.6.8(f)(3)]
 - c. sampling or monitoring, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements. [RIGL 23-23-5(7), 29.6.8(f)(4), Approval No210(a), 661 & 1786 (F)(6)]

Nothing in this condition shall limit the ability of the USEPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

G. Compliance

1. The permittee must comply with all conditions of this permit. Any noncompliance with a federally enforceable permit condition constitutes a violation of the Clean Air Act and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. Any noncompliance with a permit condition designated as not federally enforceable constitutes a violation of state rules only and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. [29.6.8(c)(1)]

2. For each unit at the facility for which an applicable requirement becomes effective during the permit term, the permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [29.6.5(a)]
3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [29.6.8(c)(2)]

H. Excess Emissions Due to an Emergency

As the term is used in this condition an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. [29.6.11(b)]

Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain a health based air quality standard.

The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that: [29.6.11(a) & 29.6.11(c)]

1. an emergency occurred and that the permittee can identify the cause(s) of the emergency; [29.6.11(c)(1)]
2. the permitted facility was at the time being properly operated; [29.6.11(c)(2)]
3. during the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and [29.6.11(c)(3)]
4. the permittee submitted notice of the emergency to the Office of Air Resources within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of Condition II.AA.3 of this permit. [29.6.11(c)(4)]

The permittee shall have the burden of proof in seeking to establish the occurrence of an emergency. [29.6.11(d)]

I. Duty to Provide Information

The permittee shall furnish to the Office of Air Resources, within a reasonable time, any pertinent information that the Office of Air Resources may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Office of Air Resources copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [29.6.8(c)(5)]

J. Duty to Supplement

The permittee, upon becoming aware that any relevant facts were omitted or incorrect pertinent information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the Office of Air Resources. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit. [29.5.4]

K. Reopening for Cause

The Office of Air Resources will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1. Additional requirements under the Clean Air Act become applicable to a major source 3 or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless this permit or any of its terms and conditions have been extended. [29.6.13(a)]
2. The Office of Air Resources or the Administrator determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. [29.6.13(c)]
3. The Office of Air Resources or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [29.6.13(d)]

Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by the Office of Air Resources at least 30 days in advance of the date that this permit is to be reopened, except that the Office of Air Resources may provide a shorter time period (but not less than five days) in the case of an emergency. [29.9.5(b)]

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. [29.9.5(a)]

All permit conditions remain in effect until such time as the Office of Air Resources takes final action. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [§70.6(a)(6)(iii)]

L. Severability Clause

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [29.6.8(b)]

M. Off-Permit Changes

1. The permittee is allowed to make certain changes that are not addressed or prohibited by this permit without a permit revision, provided that the following conditions are met: [29.11.2(a)]
 - a. Each such change shall not violate any term or condition of this permit. [29.11.2(b)]
 - b. Each change shall comply with all applicable requirements. [29.11.2(b)]
 - c. Changes under this provision may not include changes or activities subject to any requirement under Title IV or modifications under any provision of Title I of the Clean Air Act. [29.11.2(a)]
 - d. Before the permit change is made, the permittee must provide contemporaneous written notice to the Office of Air Resources and the USEPA Region I, except for changes that qualify as insignificant activities in Appendix A of APC Regulation No. 29. This notice shall describe each change, including the date, and change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change. [29.11.2(c)]
 - e. The permit shield does not apply to changes made under this provision. [29.11.2(d)]
 - f. The permittee shall keep a record describing changes made at the stationary source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes, including any other data necessary to show compliance with applicable ambient air quality standards. The record shall reside at the permittee's facility. [29.11.2(e)]
2. Changes made pursuant to this provision shall not be exempt from the requirement to obtain a minor source permit pursuant to the requirements of Air Pollution Control Regulation No. 9, if applicable. [29.11.2(a)]

3. Changes made pursuant to this provision shall be incorporated into this permit at the time of renewal. [29.11.2(f)]

N. Section 502(b)(10) Changes

1. The permittee is allowed to make changes within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit, whether expressed therein as a rate of emissions or in terms of total emissions and are not Title I modifications. This class of changes does not include:
 - a. changes that would violate applicable requirements; or
 - b. changes to federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. [29.11.1(a), 29.1.36]
2. The permittee shall provide written notice to the Office of Air Resources and the USEPA Region I of any change made under this provision. The notice must be received by the Office of Air Resources no later than fourteen (14) days in advance of the proposed changes. The notice shall include information describing the nature of the change, the effect of the change on the emission of any air contaminant, the scheduled completion date of the planned change and identify any permit terms or conditions that are no longer applicable as a result of the change. The permittee shall attach each notice to its copy of this permit. [29.11.1(a)(1), 29.11.1(a)(2)]
3. The permittee shall be allowed to make such change proposed in its notice the day following the last day of the advance notice described in paragraph 2 if the Office of Air Resources has not responded nor objected to the proposed change on or before that day. [29.11.1(b)]
4. Any permit shield provided in this permit does not apply to changes made under this provision. If subsequent changes cause the permittee's operations and emissions to revert to those anticipated in this permit, the permittee resumes compliance with the terms and conditions of the permit, and has provided the Office of Air Resources and USEPA with a minimum of fourteen (14) days advance notice of such changes in accordance with the provisions of paragraph 2, the permit shield shall be reinstated in accordance with terms and conditions stated in this permit. [29.11.1(c)]
5. Changes made pursuant to this provision shall be incorporated into the operating permit at the time of renewal. [29.11.1(d)]

O. Emissions Trading

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. [29.6.6(a)]

P. Emission of Air Contaminants Detrimental to Person or Property

The permittee shall not emit any air contaminant which either alone or in connection with other emissions, by reason of their concentration or duration, may be injurious to human, plant or animal life, or cause damage to property or which unreasonably interferes with the enjoyment of life or property. [7.1]

Q. Odors

1. The permittee shall not emit or cause to be emitted into the atmosphere any air contaminant or combination of air contaminants which creates an objectionable odor beyond the property line of this facility. [17.1]
2. A staff member of the Office of Air Resources shall determine by personal observation if an odor is objectionable, taking into account its nature, concentration, location, duration and source. [17.2]

R. Visible Emissions

1. Except as may be specified in other provisions of this permit, the permittee shall not emit into the atmosphere, from any emission unit, any air contaminant, for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]
2. Tests for determining compliance with the opacity limitations specified in this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

S. Open Fires

It shall be unlawful for the permittee to burn any material in an open fire, except as provided in APC Regulation No. 4, Section 4.3. [4.2]

T. Construction Permits

It shall be unlawful for the permittee to construct, install, modify or cause the construction, installation or modification of any stationary source subject to the provisions of APC Regulation No. 9 without obtaining either a minor source permit or a major source permit from the Director. [9.2.1]

U. Sulfur in Fuel

1. Except as may be specified in other provisions of this permit, unless the Director declares in writing after a hearing that a shortage of low sulfur fuel exists, the permittee shall not use or store fuel oil with a sulfur content greater than 1.0% by weight, except for use with marine vessels or motor vehicles. [8.2, 8.3.6]
2. Compliance with the sulfur in fuel limitations contained in this section shall be determined by the procedures listed below or by another method deemed equivalent by the Director: [29.6.3(b)]
 - a. For each shipment of fuel oil, the permittee shall obtain a certification from the fuel supplier which contains:
 - (1) For distillate fuel oil:
 - (a) the name of the supplier
 - (b) a statement that the oil complies with the specification for fuel oil number 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78 "Standard Specification for Fuel Oils."
 - (2) For residual fuel oil:
 - (a) The name of the supplier,
 - (b) The nitrogen and sulfur content of the oil and the ASTM method used to determine the nitrogen and sulfur content of the oil,
 - (c) The location of the oil when the sample was drawn for analysis to determine the nitrogen and sulfur content of the oil, specifically including whether the oil was sampled as delivered to the permittee or whether the sample was drawn from oil in storage at the oil suppliers/refiners facility or another location. [27.6.5(a-d)]
 - (3) For diesel fuel oil:
 - (a) the name of the supplier
 - (b) a statement that the oil complies with the specification for diesel fuel oil grade 1-D or 2-D, as defined by the American Society for Testing and Materials in ASTM D975-03 "Standard Specification for Fuel Oils."

- b. As an alternative to fuel oil certification, the permittee may elect to sample the fuel oil prior to combustion. Sampling and analysis shall be conducted after each new shipment of fuel oil is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any fuel oil is combusted. [29.6.3(b)]
- c. All fuel oil must be sampled and analyzed according to ASTM methods which have the prior approval of or are required by the Office of Air Resources. [29.6.3(b)]
- d. Copies of the fuel oil analysis sheets shall be maintained at the facility and be made accessible for review by the Office of Air Resources or designated personnel of the Office of Air Resources and USEPA. These records shall include a certified statement, signed by a responsible official, that the records represent all of the fuel combusted during each quarter. [29.6.3(b)]
- e. The Director may require, under his supervision, the collection of fossil fuel samples for the purpose of determining compliance with the sulfur limitations in this permit. Sampling and analysis of fossil fuels under Condition II.U.2 of this permit shall not limit the collection of samples under this condition. [8.4.3]

V. Air Pollution Episodes

Conditions justifying the proclamation of an air pollution alert, air pollution warning or air pollution emergency shall be deemed to exist whenever the Director determines that the accumulation of air pollutants in any place is attaining or has attained levels which could, if such levels are sustained or exceeded, lead to a substantial threat to the health of persons. If the governor declares an air pollution alert, air pollution warning or air pollution emergency, the permittee shall comply with the applicable requirements contained in APC Regulation No. 10. [10.1]

W. Fugitive Dust

The permittee shall not cause or permit any materials, including but not limited to sand, gravel, soil, aggregate and any other organic or inorganic solid matter capable of releasing dust, to be handled, transported, mined, quarried, stored or otherwise utilized in any way so as to cause airborne particulate matter to travel beyond the property line of the facility without taking adequate precautions to prevent particulate matter from becoming airborne. Such precaution shall be in accordance with good industrial practice as determined by the Director and/or shall be other reasonable fugitive dust prevention measures as determined by the Director. [5.2]

X. Compliance Certifications

- 1. The permittee shall submit a certification of compliance with permit terms and conditions annually. [29.6.5(c)(1)]

2. The certification shall describe the following:
 - a. the permit term or condition that is the basis of the certification; [29.6.5(c)(3)a]
 - b. the current compliance status; [29.6.5(c)(3)(b)]
 - c. whether compliance was continuous or intermittent; and[29.6.5(c)(3)c]
 - d. the methods used for determining compliance, currently and over the reporting period. [29.6.5(c)(3)d]
3. All compliance certifications shall be submitted to the Office of Air Resources and to the USEPA Region I. [29.6.5(c)(4)]
4. All compliance certifications shall be certified as being true, accurate, and complete by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements, and information in the certification are true, accurate, and complete. [29.6.8(e)]

Y. Permit Shield

1. Compliance with the terms and conditions of this permit shall be deemed compliance with all requirements applicable to the source in the following: Approval Nos. 32, 210(a) 661, , 721, , 1062, 1063, 1482, 1786, Consent Agreements Nos. 95-42-AP, 98-03-AP, 40 CFR 63.3330(a) and 63.3400(b)(1) of Subpart JJJJ, 40 CFR 63.9(b)(2) of Subpart A and RI APC Regulations Nos. 1, 4, 5, 7, 8, 9, 10, 13, 14, 16, 17, 19, 27, 28, 29, and 36. [29.6.12(a)(1)]
2. The Office of Air Resources has determined that Emission Units B001 (A), B001 (B), B002 (A), B002 (B), P001, P002 (A), P002 (B), P003, P005, L001, L003, P006, P007, P012, and P013 are not subject to the following: Rhode Island APC Regulations Nos. 2, 3, 6, 11, 12, 15, 20, 21, 22, 24, 25, 26, 30, 31, 32, 33, 35, 39 and 41. [29.6.12(a)(2)]
3. Nothing in this permit shall alter or affect the following:
 - a. the provisions of Section 303 of the Clean Air Act, including the authority of the USEPA under that Section. [29.6.12(c)(1)]
 - b. the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [29.6.12(c)(2)]
 - c. the applicable requirements of the acid rain program consistent with Section 408 of the Act. [29.6.12(c)(3)]
 - d. the ability of the USEPA to obtain information under Section 114 of the Clean Air Act. [29.6.12(c)(4)]

4. If it is determined that this operating permit was issued based on inaccurate or incomplete information provided by the permittee, this permit shield shall be void as to the portions of this permit which are affected, directly and indirectly, by the inaccurate or incomplete information. [29.6.12(d)]

Z. Recordkeeping

1. The permittee shall, at the request of the Director, provide data on operational processes, fuel usage, raw materials, stack dimensions, exhaust gas flow rates and temperatures, emissions of air contaminants, steam or hot water generator capacities, types of equipment producing air contaminants and air pollution control systems or other data that may be necessary to determine if the facility is in compliance with air pollution control regulations. [14.2.1]
2. All records and supporting information required by this permit shall be maintained at the permittee's 538 Main Street facility for a period of at least 5 years from the date of sample monitoring, measurement, report or application, and shall be made available to representatives of the Office of Air Resources and the USEPA upon request. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [14.2.1, 19.5.4(c), 29.6.4(a)(2), 27.6.11, Approval Nos. 1482(E)(7), 1062-1063(E)(9), Consent Agreement No. 98-03-AP(10)(11), 95-42-AP(6), Approval No. 210(a), 661 & 1786 (E)(7), 63.10(b)(1)]
3. The permittee shall keep records of required monitoring information that include the following:
 - a. The date, place, and time of sampling or measurements; [29.6.4(a)(1)a]
 - b. The date(s) analyses were performed; [29.6.4(a)(1)b]
 - c. The company or entity that performed the analyses; [29.6.4(a)(1)c]
 - d. The analytical techniques or methods used; [29.6.4(a)(1)d]
 - e. The results of such analyses; and [29.6.4(a)(1)e]
 - f. The operating conditions as existing at the time of sampling or measurement. [29.6.4(a)(1)f]

AA. Reporting

1. The information recorded by the permittee pursuant to Condition II.Z.1 of this Section shall be summarized and reported at least annually to the Director. It shall be submitted by April 15th unless otherwise specified. Information submitted pursuant to this condition will be correlated with applicable emissions limitations and other applicable emissions information and will be available for public inspection. [14.2.2, 14.2.3]

2. The permittee shall submit reports of any required monitoring for each semiannual period ending 30 June and 31 December of each calendar year. These reports shall be due to the Office of Air Resources no later than forty-five (45) days after the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition II.X.4. [29.6.4(b)(1)]
3. Deviations from permit conditions, including those attributable to upset conditions as defined in this permit, shall be reported, in writing, within five (5) business days of the deviation, to the Office of Air Resources. A copy of any such report shall be sent to the USEPA Region I. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. Each report must be certified by a responsible official consistent with Condition II.X.4. of this permit. [29.6.4(b)(2)]
4. The Office of Air Resources shall be notified in writing of any planned physical change or operational change to the emissions units and control devices identified in this permit. Such notification shall include information describing the nature of the change, information describing the effect of the change on the emissions of air contaminants and the scheduled completion date of the planned change. Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Office of Air Resources. [Approval Nos. 1062-1063(E)(8), 1482(E)(5)(a-d), Approval No. 210(a), 661 & 1786 (E)(6)]

BB. Credible Evidence

For the purpose of submitting compliance certifications or establishing whether or not the permittee has violated or is in violation of any provision of this permit, the methods listed in this permit shall be used, as applicable. However, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the permittee would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. [40 CFR 51.212(c), 51.12(c), 52.33(a)]

CC. Emission Statements

1. The permittee shall submit annually an emission statement which includes information for both VOC and NO_x if facility wide actual emissions are 25 tons per year of either pollutant. Emission statements shall be submitted to the Office of Air Resources on April 15th of each year unless otherwise specified. The permittee may apply to the Office of Air Resources to be allowed to discontinue submitting annual emission statements if actual emissions at the facility decrease to below 10 tons per year as a result of a permanent process change. [14.3.1]

The permittee shall submit an emission statement in a format approved by the Office of Air Resources. The emission statement shall contain the following information: [14.3.2]

- a. A certification that the information contained in the emission statement is accurate and complete to the best knowledge of the certifying individual.
- b. The full name, title, signature, date of signature, and telephone number of the certifying individual.
- c. Facility identification information, including the full name, physical location, mailing address, latitude, longitude, and four digit SIC code(s).
- d. Process data pertaining to each process emitting VOC and/or NO_x, including:
 - (1) Annual and typical ozone season daily fuel use,
 - (2) Annual and typical ozone season daily process rate(s), and
 - (3) Process throughput while air pollution control equipment was not in operation.
- e. Operating data pertaining to each process emitting VOC and/or NO_x during the reporting year, including:
 - (1) Percentage annual throughput,
 - (2) Average hours of operation per day during the reporting year and on a typical ozone season day,
 - (3) Average number of days of operation per week during the reporting year and during a typical ozone season week, and
 - (4) Weeks of operation during the reporting year and during the peak ozone season.
- f. Control equipment information, including:
 - (1) Specific primary and secondary control equipment for each process emitting VOC and/or NO_x,
 - (2) Current overall control efficiency for each piece of control equipment (indicated by percent capture and percent destruction or removal), and
 - (3) Control equipment downtime during the reporting year and during the peak ozone season.
- g. Emissions information, including:
 - (1) Actual annual and typical ozone season daily emissions of VOC and NO_x for each process. Emissions should be reported in tons per year and in pounds per day.
 - (2) A description of the emission calculation method and, if applicable, emission factor(s) used, and
 - (3) The calendar year for which emissions are reported.
- h. Any additional information required by the Director to document the facility's emission statements.

DD. Miscellaneous Conditions

1. This permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request, by the permittee, for a permit modification, revocation and reissuance or termination or of a notification of planned changes or anticipated noncompliance does not release the permittee from the conditions of this permit. [29.6.8(c)(3)]
2. Any application for a permit revision need only submit information related to the proposed change. [29.4.3(c)]
3. Terms not otherwise defined in this permit shall have the meaning given to such terms in the referenced regulation.
4. Where more than one condition in this permit applies to an emission unit and/or the entire facility, the most stringent condition shall apply.

SECTION III. SPECIAL CONDITIONS

A. Ozone-depleting Substances

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR 82.106.
 - b. The placement of the required warning statement must comply with the requirements of 40 CFR 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements of 40 CFR 82.110.
 - d. No person may modify, remove or interfere with the required warning statement except as described in 40 CFR 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F:
 - a. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices of 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment of 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152) must comply with recordkeeping requirements of 40 CFR 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair equipment requirements of 40 CFR 82.156.

- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 3. If the permittee manufactures, transforms, imports or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, "Production and Consumption Controls".
- 4. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

B. Prevention of Accidental Releases

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

Your facility is subject to the requirements of the General Duty Clause, under 112(r)(1) of the CAA Amendments of 1990. This clause specifies that owners or operators of stationary sources producing, processing, handling or storing a chemical in any quantity listed in 40 CFR Part 68 or any other extremely hazardous substance have a general duty to identify hazards associated with these substances and to design, operate and maintain a safe facility, in order to prevent releases and to minimize the consequences of accidental releases which may occur.